

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

CIVIL ACTION NO: 2:19-cv-00247-JAW

NEWREZ LLC, F/K/A NEW PENN
FINANCIAL, LLC, D/B/A SHELLPOINT
MORTGAGE SERVICING

PLAINTIFF

v.

BENJAMIN CAMPO, ESQ., SPECIAL
ADMINISTRATOR OF THE ESTATE OF
REBECCA G. ANDERSON, AND THOMAS A.
ANDERSON

DEFENDANTS

**OBJECTION TO SCHEDULING ORDER
AND PARTIES' PROPOSED DISCOVERY PLAN**

Counsel for Plaintiff and for the Estate of Rebecca G. Anderson (“Defendant”) conducted a Rule 26(f) conference in this matter on October 16, 2019. As a result of that conference, the parties respectfully request that the discovery deadline be extended by three months and that the other deadlines set forth in the Court’s scheduling order be modified accordingly.

The reason for these requested alterations is that the Defendant is attempting to sell the property. This effort requires coordination between not only Plaintiff and Special Administrator Campo (acting on behalf of the Estate), but also between Special Administrator Campo and Defendant Thomas A. Anderson. The parties anticipate that any discovery in this matter may require additional time to conduct and to complete under such circumstances.

In light of this situation, the parties would propose the following revisions to the Court's Scheduling Order:

Deadline for Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1): November 30, 2019

Deadline for Amendment of the Pleadings and Joinder of Parties: January 21, 2020

Expert Witnesses: Neither party anticipates any expert witness testimony

Deadline to Complete Discovery: May 20, 2020

Deadline to file Notice of Intent to file Motion for Summary Judgment and Need for a

Pre-Filing Conference Pursuant to Local Rule 56(h): May 27, 2020

Expected Trial Date (assuming the property has not been sold): This case shall be ready for trial by July 6, 2020

Further Matters in Aid of Disposition: None needed, because the parties have already discussed potential resolutions outside of foreclosure.

Special Administrator Campo has consented to this Objection.

Plaintiff NewRez LLC, f/k/a New Penn
Financial, LLC d/b/a Shellpoint Mortgage
Servicing

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CERTIFICATE OF SERVICE

I, Matthew Crouter, hereby state that a true and correct copy of the Objection to Scheduling Order and Proposed Discovery Plan is being filed electronically utilizing the ECF system and that the ECF system will automatically generate and send a Notice of Electronic Filing to all users associated with the case. If the ECF system indicates that a party is being served electronically, such service will be deemed to comply with the ECF system. If the ECF system indicates that a party is not a user of the ECF system, a true and correct copy of this filing will be delivered by United States first class mail, postage prepaid, to any such party.

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